

# *Sugar Cane Growers* *Cooperative of Florida*

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POST OFFICE BOX 666

BELLE GLADE, FLORIDA

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33430-0666

U.S. Army Corps of Engineers Headquarters  
Attn: P&G Revision  
CECW\_ZA  
441 G Street NW  
Washington, DC 20314

To Whom It May Concern:

Please accept the following comments on behalf of the 47 grower-members of Sugar Cane Cooperative of Florida, an agricultural cooperative based in Belle Glade, Florida located in the heart of the Everglades Agricultural Area (EAA). Primary functions of the Cooperative are the harvesting, transporting and processing of sugarcane and the marketing of the final products. Our grower-members ability to farm is dependent on the services provided by the Central and Southern Florida Flood Control Project. Therefore, we have a continuing interest in the Comprehensive Everglades Restoration Plan (CERP) that was intended to provide the framework for planning future improvements to the Project.

Since the Principles and Standards (P&S) govern the Corps of Engineers planning for CERP implementation, we have a keen interest in any proposed revisions or changes to them. This letter complements and supplements the comments made in my letter dated August 6, 2008 regarding the Administration's intention to revise the P&S pursuant to the Water Resources Development Act of 2007. The following comments address the specific issues raised by the Proposed Principles published in the Federal Register on September 12, 2008.

Because only the proposed Principles have been released, many uncertainties remain concerning the meaning and effect of the guidance on project planning as it is actually practiced by the Corps. The proposed Principles indicate important new directions in Corps planning. We strongly endorse the continuing commitment to incremental analysis and explicit display of tradeoffs as necessary for sound project development. While many of the changes will allow the Corps to incorporate current scientific data and planning theory into project development more effectively, the proposed Principles remain flawed.

Section 7.2 Alternative Plans is particularly misguided. The idea of requiring a National Economic Development (NED), an Environmental Quality and a Primarily Nonstructural Plan in every project study will enormously complicate the planning process. It will distract from

developing solutions that may have broad support and could be implemented. CERP project planning in many ways is the model underlying these Proposed Principles.

CERP planning is multiple-objective, watershed based, collaborative, science-based and “multi-criterion.” It also has been broadly criticized by its non-Federal sponsor, the South Florida Water Management District, many interest groups, and by independent reviewers such as the National Research Council’s Committee on Independent Scientific Review of Everglades Restoration Progress as being overly complex. While we do not agree with many of the criticisms, we strongly believe that requiring additional arbitrarily formulated plans as directed by this section will not facilitate good decision making. Instead it would further enmesh CERP project development in unproductive analyses.

For example, we have no idea how one would formulate a “primarily nonstructural plan” as an alternative to major water storage and conveyance facilities needed to restore the Everglades. In fact, we do not even know what kind of measures would be considered for such a plan since “nonstructural” has not been defined. Would a change of an operational schedule or regime be a “primarily nonstructural plan”? Moreover, there has been no monetization of benefits in CERP project studies to date, yet such studies would be required to develop a NED Plan. We believe this section needs to be completely rethought if the Secretary of the Army is committed to advancing a coherent process for developing projects that can be implemented within a reasonable timeframe without a waste of valuable financial and human resources. We fully endorse the monetization of costs and benefits when it can be credibly done to facilitate an understanding of the various tradeoffs among project outputs.

In our earlier comment letter, we emphasized the need to factor in the timing of environmental benefits when evaluating alternative individual project components. For example, two alternatives may cost the same amount of money and produce the same outputs, but the second alternative may take twice as long to achieve the benefit. Therefore, alternative one would be the better choice. This must be applied consistently to all types of benefits whether or not they are monetized. We note that there is no reference at all to discounting in the proposed Principles and cannot over-emphasize how important this concept is, and it should not be ignored in the Principles. All supporters of CERP argue for doing projects as soon as practicable. Universally, society prefers benefits occur sooner rather than later and this should be reflected in the Principles. Allowing planners to formulate and evaluate alternatives without considering the timing of the component’s benefits or costs is an implicit, unwarranted means of assuring that no project gets authorized and nothing gets done.

We note that in some instances the Proposed Principles use the word “meet” as in Section 8 “....assessment of the plans [sic] ability to meet the evaluative criteria that....” We urge that in such instances the word “address” be used. It is essential the P&S framework avoid the imposition of absolute criteria in the planning framework as much as possible. When evaluative criteria are treated as requirements rather than targets, incremental analysis is discouraged, and trade-offs between incremental costs and benefits are not undertaken. As a result, unproductive elements are included in projects and opportunities to make important

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contributions to ecosystem restoration may be missed. In the case of CERP, rigid adherence to unachievable water quality standards may prevent investments in improvements in the quantity, timing and distribution of water to the ecosystem.

The discussion of "multi-criterion" evaluation in Section 8.1 should distinguish between those criteria that are constraints, i.e., must be met absolutely and those for which there can be various levels of performance. For example, in the case of CERP, maintaining the existing level of flood protection is a constraint. Alternatives that decrease the level of flood protection would be an area of concern. The use of the word "balanced" in alternative analyses should be avoided since it has no operational definition and is subjective to the planner.

In conclusion, CERP project planning has been a prototype for many of the ill-advised concepts and requirements contained in the Proposed Principles. The inability of the Corps to produce timely CERP Project Implementation Reports should serve as lessons learned about how unreasonable requirements and un-implementable concepts lead to delays and should be avoided in the new Principles and Standards. We respectfully request that project alternatives be reviewed incrementally and in a straightforward manner. We thank you for the opportunity to comment.

Sincerely,



Barbara J. Miedema  
Vice President, Public Affairs & Communications

BJM:swd

cc: Ms. Carol Wehle, South Florida Water Management District